

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

CHESAPEAKE ENERGY)
CORPORATION, an Oklahoma)
corporation,)
)
Plaintiff,)
)
vs.) CIV-2007-318-C
)
TXD SERVICES, LP, a Texas limited)
partnership,)
)
Defendant.)

TXD SERVICES, LP'S FINAL WITNESS AND EXHIBIT LISTS

Pursuant to the Court's Scheduling Order, Defendant, TXD Services, LP ("TXD") hereby submits the following final witness and exhibit lists.

I. Witness List

Name/Contact Information	Anticipated Testimony
Joe Poe Managing Partner TXD Services, LP 6300 Ridgelea Place, Suite 210 Fort Worth, TX 76116 (817) 546-3000	Deposed.
Dick Varnell Managing Partner TXD Services, LP 6300 Ridgelea Place, Suite 210 Fort Worth, TX 76116 (817) 546-3000	Deposed.

Name/Contact Information	Anticipated Testimony
Greg Pearce Operations Manager TXD Services, LP 1703 N. Cedar Street Morrellton, AR 72110 (501) 354-7800	Deposed.
Bob Costello Chesapeake Division Counsel Northern Division Chesapeake Energy Corp. 6100 N. Western Avenue Oklahoma City, OK 73118 (405) 879-9395	Deposed.
Darvin Knapp Senior Vice President of Drilling Southern Division Chesapeake Energy Corp. 6100 N. Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Deposed.
Steve Miller Senior Vice President of Drilling Chesapeake Energy Corp. 6100 N. Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Deposed.
David Winchester District Manager, Arkoma Chesapeake Energy Corp. 6100 N. Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Mr. Winchester may testify regarding the formation of the drilling contracts between Chesapeake and TXD; knowledge of testing of Rig #201 by Schramm; Chesapeake's wrongful termination of the drilling contracts.

Name/Contact Information	Anticipated Testimony
Randy Patterson Senior Drilling Engineer Chesapeake Energy Corp. 6100 N. Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Deposed.
William Cowles TXD Transport 1703 N. Cedar Street Morrellton, AR 72110 (501) 354-7800	Mr. Cowles may testify regarding delivery of drilling Rig #201 to Chesapeake in Arkansas.
Mark Deal Manager, Drilling Engineer Northern Division Chesapeake Energy Corp. 6100 N. Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Mr. Deal may testify regarding the negotiation of the drilling contracts; assessments of drilling needs of Chesapeake before entry of the contracts.
Frank Gabriel, Jr., PE Schramm, Inc. 800 E. Virginia Avenue Westchester, PA (610) 696-2500	Deposed.
Greg Hillier President Schramm, Inc. 800 E. Virginia Avenue Westchester, PA (610) 696-2500	Deposed.
Edward Breiner Schramm, Inc. 800 E. Virginia Avenue Westchester, PA (610) 696-2500	Deposed.
Norm Bennett Schramm, Inc. 800 E. Virginia Avenue Westchester, PA (610) 696-2500	Deposed.

Name/Contact Information	Anticipated Testimony
Eric Reuterfors Woolslayer Companies P. O. Box 216 Tulsa, OK 74101-0216 (918) 523-9191	Mr. Reuterfors may testify regarding the load testing performed on TXD Rotadrill Rig #201.
Dewayne Vogt Chief Engineer Woolslayer Companies P. O. Box 216 Tulsa, OK 74101-0216 (918) 523-9191	Mr. Vogt may testify regarding the load and pull testing performed on TXD Rotadrill Rig #201 and results of same.
Charles Grady Premium Pipe Supply 1703 N. Cedar Street Morrellton, AR 72110 (501) 354-7800	Mr. Grady may testify regarding the pull capabilities and operation of Rig #201.
Mark Merideth Operations Manager Premium Pipe Supply 1703 N. Cedar Street Morrellton, AR 72110 (501) 354-7800	Mr. Merideth may testify regarding the pull capabilities and operation of Rig #201.
Charles Dolby Sales Manager Schramm, Inc. 800 E. Virginia Avenue Westchester, PA (610) 696-2500	Mr. Dolby may testify regarding the capabilities of TXD Rotadrill rig.
Dwayne "Pop" Freeman Red's Satellite Service, Co. 1002 Oak Street Abilene, TX 79602 (325) 676-4376	Mr. Freeman may testify about his observation of pull testing performed on Rig #202 and the use of monitoring equipment he provided for the testing.
Duane Yost Yost Drilling Co. c/o Chesapeake Energy Corp. 6100 North Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Deposed.

Name/Contact Information	Anticipated Testimony
Sam McCaskill Nomac Drilling Co. c/o Chesapeake Energy Corp. 6100 North Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Deposed.
Paul M. Earl, Jr. Professional Engineer Senior Consultant Rimkus Consulting Group, Inc. 8 Greenway Plaza, Suite 500 Houston, TX 774046 (713) 621-3550	Mr. Earl will provide expert testimony regarding the capability of the TXD 180 rigs; safety factors; industry standards and engineering standards applicable to the rigs; and the ability of the rigs to safely perform the requirements of the drilling contracts.
Richard Thompson c/o Chesapeake Energy Corp. 6100 N. Western Avenue Oklahoma City, OK 73118 (405) 848-8000	Deposed.
Witnesses listed by Plaintiff not objected to by TXD.	
TXD reserves the right to supplement this witness list as discovery is ongoing	

II. Exhibit List

No.	Date	Description	Identifying Info
1.		IADC Drilling Bid Proposal and Day Work Drilling Contract for Rig #201.	
2.		IADC Drilling Bid Proposal and Day Work Drilling Contract for Rig #202.	
3.		IADC Drilling Bid Proposal and Day Work Drilling Contract for Rig #203.	
4.		IADC Drilling Bid Proposal and Day Work Drilling Contract for Rig #204.	
5.		Schramm, Inc. TXD Rotadrill Specifications	TXD-00001 – 2
6.	12/16/03	Article re TXD 130	Defendant's Ex. 2 to Deposition of Duane Yost

No.	Date	Description	Identifying Info
7.	11/10/05	E-mail from Darvin Knapp (CEC) to Joe Poe re: interest in contracting 4 to 7 drilling rigs for Fayetteville Shale in Arkansas and requesting inventory of one of the 450HP rigs rated at 6500' TVD and 4 to 6 rigs rated to 9500' for horizontal drilling	TXD-00003
8.	11/11/05	E-mails from Joe Poe to Darvin Knapp re: Schramm Rotadrills Rotary Top Head Drilling Rigs and T130XD rig	TXD-00004 - 9
9.	11/11/05	E-mail from Joe Poe to Darvin Knapp, cc: B. Lynton and Eric Freeman re: rates and agreement	TXD-00010 - 11
10.	11/15/05 - 11/16/05	E-mail from Joe Poe to Darvin Knapp, cc: B. Lynton re: "Mobile Rigs for Arkansas"; working rig identified outside of Ft. Worth ready for inspection	TXD-00012 - 15
11.	11/16/05	E-mail from Darvin Knapp to Joe Poe regarding Mobile Rigs for Arkansas	Defendant's Ex. 4 to Deposition of Darvin Knapp
12.	12/05/05	E-mail from Joe Poe to Darvin Knapp – Schramm standing by for info	TXD-00016
13.	12/05/05	E-mail from Darvin Knapp to Steve Miller regarding small rigs TXD 180s are good fit for Fayetteville	
14.	12/15/05	E-mail from Steve Miller to Darvin Knapp regarding Rigs	Defendant's Ex. 3 to Deposition of Darvin Knapp
15.	12/15/05	E-mail from Dave Winchester to Darvin Knapp regarding rigs "there is concern with the derrick rating being on the light side for our needs"	
16.	12/21/05	E-mail from Joe Poe to Darvin Knapp re: new air / mud rigs	TXD-00017
17.	12/28/05	E-mail string between Steve Miller and Tom Ward regarding Joe Poe - Rigs / Fayetteville Shale	Defendant's Ex. 5 to Deposition of Darvin Knapp
18.	12/28/05	E-mail from Steve Miller to Tom Ward; Subject: Joe Poe Rigs/Fayetteville Shale	
19.	01/09/06	E-mail from Joe Poe to Darvin Knapp re: new rigs and contracts	TXD-00018
20.	01/09/06	E-mail from Joe Poe to Darvin Knapp re carrier rigs	TXD-00019
21.	01/12/06	Letter from Frank C. Gabriel Jr., PE (Schramm) to Joe Poe (TXD) re telemast depth ratings	TXD-00020
22.	01/13/06	E-mail from Greg Pearce to Joe Poe regarding Fayetteville Rigs	S000166

No.	Date	Description	Identifying Info
23.	01/17/06	E-mail from Joe Poe to Darvin Knapp re: contracts	TXD-00021
24.	01/19/06	E-mail from Joe Poe to Darvin Knapp regarding Arkansas rigs	
25.	01/23/06	E-mail fro Greg Pearce to Darvin Knapp enclosing the 1/12/06 letter from Schramm, Inc.	
26.	01/23/06	E-mail string from Greg Pearce to Darvin Knapp; Subject: Schramm Rig Letter	Defendant's Ex. 32 to Deposition of Randy Lee Patterson
27.	01/24/06	E-mail fro Steve Donley to David Younglood; Subject: Torque/Drag Analysis	Defendant's Ex. 6 to Deposition of Darvin Knapp
28.	01/25/06	E-mails between Joe Poe and Darvin Knapp re: "Rough Draft Day Work Contract"	TXD-00022 – 23
29.	01/25/06	E-mail from Joe Poe to Darvin Knapp attaching photos of single pit system	TXD-00024
30.	01/24/06 - 01/25/06	E-mail string between Darvin Knapp and Dave Winchester et al. Regarding Torque/Drag Analysis	Defendant's Ex. 31 to Deposition of Randy Lee Patterson
31.	01/27/06	E-mail from Joe Poe to Darvin Knapp, cc: Greg Pearce, Dick Varnel and B. Lynton re: "Arkansas Day Work Contract" and final contract attached	TXD-00025 – 26
32.	01/27/06	E-mail from Joe Poe to Darvin Knapp enclosing drilling contract with paragraph requested by Chesapeake regarding 230,000 pound gross pull on "Exhibit A"	
33.	02/07/06	E-mail from Joe Poe to Darvin Knapp attaching revised drilling contract	TXD-00027
34.	02/08/06	E-mails between Joe Poe, Darvin Knapp re: "Mud Pit Requirements" and slug tank volumes	TXD-00028 – 29
35.	02/08/06	E-mail from Joe Poe to Darvin Knapp re inspection of Schramm rig	TXD-00031
36.	02/08/06	E-mails from Joe Poe to Darvin Knapp re "Contract Verbage"	TXD-00030 – 32
37.	02/08/06	E-mail from Steve Miller to Darvin Knapp regarding contract verbiage	
38.	02/09/06 - 02/09/06	E-mails between Joe Poe, Darvin Knapp, Greg Pearce, Dick Varnel, B. Lynton, Dave Winchester, Bill Roberts, and Russ White re: "Mud Pit Requirements"	TXD-00033 – 34
39.	02/09/06	E-mail from Joe Poe to Darvin Knapp re "Final Revised Contract" and changes attached	TXD-00035

No.	Date	Description	Identifying Info
40.	02/09/06	E-mail from Joe Poe to Darvin Knapp; Subject: Final Revised Contract with attached contract showing redlined changes	
41.	02/10/06	E-mail from Joe Poe to Darvin Knapp re: "Revised Drilling Contracts" and meeting	TXD-00036
42.	02/10/06	E-mail from Joe Poe to Darvin Knapp re: revisions to ¶ 4.5, 4.6 and 4.8	TXD-00037
43.	2/10/06	E-mail from Darvin Knapp to Dave Winchester - do you see any problems with this contract	
44.	2/10/06	E-mail from Steve Miller to Darvin Knapp regarding final revised contract "Looks ok except early termination which I think we are changing" SVM	
45.	2/12/06	E-mail from Mark Deal to Darvin Knapp regarding final revised contract	
46.	02/14/06	E-mail from Joe Poe to Darvin Knapp re: "Chesapeake Energy Air Units"	TXD-00038
47.	02/16/06 - 02/17/06	E-mails between Steve Miller, Greg Pearce, Randy Patterson, Darvin Knapp, Joe Poe, Ron Goff and Mark Deal re: Schramm Rigs (re: letter from Schramm and questions re: Schramm 180, pulling 230k, 180,000 hydraulic pull and 270,000 equivalent normal rating; Randy and Greg's interpretation of the Schramm letter;	TXD-00039 - 50
48.	02/17/06	E-mail from Greg Pierce to Randy Patterson (assured CHK that one could "adjust pull rating as needed up to 230k")	TXD-00039 - 50
49.	02/17/06	E-mail from Joe Poe to Steve Miller (cc: Greg Pearce and Darvin Knapp) re: receipt, execution and return of contracts	TXD-00039 - 50 TXD-00042
50.	02/17/06	E-mail from Steve Miller to Randy Patterson et al. Stating contracts are good to go "as is"	TXD-00043
51.	02/17/06	E-mail string between Darvin Knapp and Steven Donley regarding Joe Poe Schramm Rigs	Defendant's Ex. 16 to Deposition of Darvin Knapp
52.	02/17/06	Chesapeake's Rig Depth Calculator, attached to Randy Patterson's 2/16/06 e-mail to Mark Deal	
53.	02/17/06	E-mail from Steve Miller to Randy Patterson stating contracts are "good to go as is"	
54.	02/26/06	E-mail from Steve Miller to Mark Deal, Ron Goff and Darvin Knapp	TXD-00040
55.	02/28/06	E-mails between Joe Poe and Darvin Knapp re: air packages	TXD-00050 - 51

No.	Date	Description	Identifying Info
56.	03/14/06	TXD meeting Agenda	S000012
57.	04/05/06	E-mail from Joe Poe to Darvin Knapp re "New T130XD Schramm"	TXD-00050 - 51
58.	12/18/06	Appraisal for Rig No. 201, Schramm TXD Rotadrill	
59.	12/24/06	E-mail string between Mark Lester and Aubrey McClendon et al. regarding Fayetteville Shale	Defendant's Ex. 12 to Deposition of Darvin Knapp
60.	12/27/06	E-mail from Steve Miller to Darvin Knapp - no outs in contract (without attachment)	Defendant's Ex. 14 to Deposition of Darvin Knapp
61.	12/23/06 - 12/27/06	E-mail string between Darvin Knapp and Aubrey McClendon et al. regarding Fayetteville Shale	Defendant's Ex. 13 to Deposition of Darvin Knapp
62.	01/23/07	Chesapeake Operating, Inc. Authorization for expenditure	Defendant's Ex. 30 to Deposition of Randy Lee Patterson
63.	01/31/07	E-mail from Steve Miller to Darvin Knapp; Subject: Active Rig List as of January 30, 2007	Defendant's Ex. 17 to Deposition of Darvin Knapp
64.	02/09/07	E-mail from Greg Hillier to Joe Poe, et al. With subject line "Daily Report TXD J135-0102, Rig 201 2/8/07"	
65.	02/09/07	E-mail from Greg Hillier regarding Daily report TXD	Ex. 6 to Deposition of Greg Hillier; S000083
66.	02/11/07	E-mail from Greg Hillier regarding daily report for TXD Rig 201	S000080
67.	02/12/07	E-mail string between Randy Patterson and Rene St. Pierre; Subject: Joe Poe - Schramm Rigs	
68.	02/12/07	E-mail from Randy Patterson to Rene St. Pierre regarding Joe Poe Schramm rigs "looks pretty clear"	
69.	02/15/07	E-mail from Joe Poe to Bob Costello (cc: Dick Varnell) re: "Re: Rig Cancellation Letter" asking time of conference call	
70.	02/16/07	E-mail from Bob Costello to Joe Poe, Dick Varnell and B. Lynton with attached letter discussed on 2/15/07	
71.	02/16/07	Letter from Robert P. Costello (CEC) to Joe Poe re 2/15/07 teleconference and CEC's proposal to terminate drilling contracts and utilization of Rig 201 to drill Moore 1-5H	

No.	Date	Description	Identifying Info
72.	02/16/07	E-mail from Steve Doneley to Rene St. Pierre; Subject Torque and Drag Scenarios.	Defendant's Ex. 19 to Deposition of Darvin Knapp
73.	02/19/07	E-mail from Joe Poe to Bob Costello (cc: Darvin Knapp, Dick Varnel, B. Lynton) re: Woolslayer Company, Inc.	TXD-00056
74.	02/19/07	E-mail from Joe Poe to Bob Costello, cc: Darvin Knapp, Dick Varnell, B. Lynton re: pull test of TXD Rig #201 at GTI Catoosa Test Facility	TXD-00057
75.	02/19/07	E-mail from Bob Costello to Joe Poe, cc: Darvin Knapp, Dick Varnell, B. Lynton and D. Winchester re: withdrawal of 2/15/07 letter, "[w]e will no longer offer any compromises,..."	TXD-00058
76.	02/20/07	E-mail from Joe Poe to Bob Costello, cc: Greg Pearce, Dick Varnell, B. Lynton re: Schramm engineers in AR (Greg Hillier and Norm Bennett) and faxing letter	TXD-00059
77.	02/20/07	E-mail from Joe Poe to Bob Costello, cc: Dick Varnell, B. Lynton, Darvin Knapp, Greg Pearce, R. Yeager, D. Winchester re: IADC contracts and pull capacity and test	TXD-00060
78.	02/20/07	E-mail from Joe Poe to Bob Costello, cc: Dick Varnell, B. Lynton, Darvin Knapp, Greg Pearce, R. Yeager, D. Winchester re: summary of recent events between CEC and TXD	TXD-00061 - 62
79.	02/20/07	E-mail from Costello to Joe Poe, cc: Dick Varnell, B. Lynton, Darvin Knapp, Greg Pearce, R. Yeager, D. Winchester re: info from Schramm reps, conversations and attaching letter	TXD-00063 – 65
80.	02/20/07	E-mail from Costello to Joe Poe, cc: Dick Varnell, B. Lynton, Darvin Knapp, Greg Pearce, R. Yeager, D. Winchester requesting Schramm January letter and names of Schramm engineers	TXD-00066
81.	02/21/07	E-mail from Greg Hillier to Ed Breiner; Subject: Component Limitations for Pull Test	Ex. 5 to Deposition of Ed Breiner; S000047-48
82.	02/21/07	E-mail from Greg Hillier to Ed Breiner regarding Pull test	Ex. 8 to Deposition of Greg Hillier; S000065
83.	02/22/07	E-mail from Greg Hillier to Ed Breiner et al. with daily report regarding pull test on Rig 201 at Woolslayer	S000049-50
84.	02/23/07	E-mail from Greg Hillier to Chris Cheeseman, et al regarding pull test	S000046-48

No.	Date	Description	Identifying Info
85.	02/24/07	E-mail from Greg Hillier to Joe Poe et al. regarding delivery of shims requested by Mark Meredith	S000039
86.	02/26/07	Second load testing of TXD #J135-0102, Trailer Mounted Rotodrill Mast 180,000# Capacity at GTI Testing Facility in Owasso, Oklahoma; witnessed by Woolslayer (See Woolslayer's Inspection Report IR024-07 dated 3/8/07) Woolslayer Companies, Inc. performs second load testing of Rig 201 (TDX #J135-0102, Trailer Mounted Rotodrill Mast 180,000# Capacity, Service Report No. E-3766 (Inspection Report IR024-07) by Erik Reuterfors (Woolslayer) at GTI Testing Facility in Owasso, Oklahoma; Report dated 03/08/07 and written by Dewayne G. Vogt, Chief Engineer	
87.	02/26/07	E-mail from Joe Poe to Costello; cc: Darvin Knapp, S. Miller, G. Pearce, R. Yeager, Dick Varnel, B. Lynton, D. Winchester, B. Cowles, and C. Grady re: results of pull tests on Rig #201 on 2/24/07 (as requested by Bob Yeager) and CEC's communications with Schramm	TXD-00067
88.	02/26/07	E-mail from Costello to Joe Poe, cc: D. Knapp, S. Miller, G. Pearce, R. Yeager, Dick Varnel, B. Lynton, D. Winchester, B. Cowles and C. Grady requesting reports of pull tests and scheduling a meeting	TXD-00068 – 69
89.	02/26/07	E-mails between Bob Yeager and Bob Costello re: Costello's comments re: "facts of an otherwise very unusual situation"	TXD-00070 – 72
90.	02/26/07	E-mail from Costello to Bob Yeager, cc: Joe Poe and Dick Varnell re: must meet prior to making any decision to utilize the rig	TXD-00073 – 75
91.	02/24/07 - 02/26/07	E-mail string between Greg Hillier & Ed Breiner regarding Chesapeake	S000036-37
92.	02/27/07	E-mail from Greg Hillier to Ed Breiner regarding telephone conference with Bob Costello	Ex. 11 to Deposition of Greg Hillier; S000033

No.	Date	Description	Identifying Info
93.	02/28/07	<p>Second load testing of TDX #J135-0102, Trailer Mounted Rotodrill Mast 180,000# Capacity at GTI Testing Facility in Owasso, Oklahoma; witnessed by Woolslayer (See Woolslayer's Inspection Report IR023-07 and IR023-07 Revision 1)</p> <p>Load testing of TDX #J135-0102, Trailer Mounted Rotodrill Mast 180,000# Capacity, Service Report No. E-3758 (Inspection Report IR023-07) by Jerry Bell and Erik Reuterfors (Woolslayer) at GTI Testing Facility in Owasso, Oklahoma; Report dated 02/28/07 and written by Dewayne G. Vogt, Chief Engineer</p>	
94.	03/01/07	E-mail from Erik Reuterfors to Joe Poe with preliminary inspection report of witnessing load test at GTI facility	TXD-00076
95.	03/01/07	E-mail from Gregory Hillier to Joe Poe, cc: E. Breiner re: "Woolslayer Test for TXD J135-0102" re: cylinder area x pressure calculations	TXD-00078
96.	03/01/07	E-mail from Joe Poe to G. Pearce forwarding e-mail from Hillier to Poe re: cylinder area x pressure calculations	TXD-00078
97.	03/01/07	E-mail from Yeager to Costello, cc: Poe and Varnel enclosing Load Testing Report IR023-07 and re: scheduling meeting	TXD-00079
98.	03/01/07	E-mail from Joe Poe to Darvin Knapp attaching pull test	TXD-00077
99.	03/01/07	Schramm Rig Specs for TXD	S000001-10
100.	03/01/07	E-mail from Norman Bennett to Greg Hillier regarding 200,000# rating for TXD	S000031
101.	03/01/07	E-mail from Greg Hillier to Duane Yost regarding TXD Basic Information	
102.	03/05/07	E-mail from Bob Yeager to Costello, cc: Joe Poe and Dick Varnell re: "Load Testing Report IR023-07" and identity of individuals attending meeting on 3/7/07 (Poe, Varnell, Yeager, Pearce, Sitton, Costello, Knapp, Miller, Winchester, Hood, Hillier and Schramm's VP of Engineering)	TXD-00080

No.	Date	Description	Identifying Info
103.	03/05/07	E-mail from Greg Hillier (Schramm) to Joe Poe and Greg Pearce, cc: E. Breiner (Schramm), N. Bennett (Schramm) and P Christian (Schramm) re: Schramm's "effort to offer a possible solution to [TXD's] contract issue with Chesapeake" by offering an "intermittent hoist rating of 200,000 lbs in a creep mode (25'/min)"	TXD-00082
104.	03/05/07	E-mail from Greg Hillier to Joe Poe regarding new hoist rating for TXD	S000028
105.	03/05/07	E-mail string between Greg Hillier and Ed Breiner regarding load testing report	S000029-30
106.	03/06/07	E-mails between Yeager, Costello, cc: Poe, Varnel, R. Sitton, D. Knapp re: drilling activities at Moore 1-5H and instructions by CEC's field personnel	TXD-00083 - 84
107.	03/01/07 - 03/06/07	E-mails between Greg Hillier (Schramm) and Bob Costello re: meeting with TXD and Schramm's attendance and Schramm's reevaluation of hoist system and offer	TXD-00085 - 88
108.	03/06/07	E-mail from Greg Hillier (Schramm) to Joe Poe, cc: N. Bennett (Schramm) re: "New Intermittent Rating for TXD" and offering possible solution to contract issue with CEC - - intermittent hoist rating of 200,000 lbs in a creep mode (25'/min)	TXD-00089
109.	03/06/07	Greg Hillier e-mail to Joe Poe regarding New Intermittent Rating for TXD	S000023
110.	03/06/07	E-mail string from Greg Hillier to Bob Costello regarding load test report	S000024-27
111.	03/06/07	E-mail string from Connie Turner to Darvin Knapp attaching rig inventories for TXD rigs	
112.	03/07/07	Inspection Report IR023-07 Revision 1 by Dewayne G. Vogt, Chief Engineer of Woolslayer Companies, Inc. (Service Report No. E-3758) – witness to second load testing conducted on 2/28/07 of TDX #J135-0102, Trailer Mounted Rotodrill Mast 180,000# Capacity at GTI Testing Facility in Owasso, Oklahoma	

No.	Date	Description	Identifying Info
113.	03/08/07	Inspection Report IR024-07 by Dewayne G. Vogt, Chief Engineer of Woolslayer Companies, Inc. (Service Report No. E-3766) – witness to second load testing conducted on 2/26/07 of TDX #J135-0102, Trailer Mounted Rotodrill Mast 180,000# Capacity at GTI Testing Facility in Owasso, Oklahoma	
114.	03/08/07	Transmittal Notice from Rachel Kinglsey (Woolslayer) to Joe Poe (TXD) - Inspection Reports IR023-07 and IR024-07 for Trailer Mounted Rotodrill Mast, Office Order No. 1260	TXD-000109 - 112
115.	03/08/07	E-mail from Costello with CEC's offer of \$20 million to purchase rigs	TXD-00090
116.	03/08/07	Letter from Robert P. Costello (CEC) to Joe Poe, Robert L. Yeager, III and Richard L. Sitton re: purchase offer (\$17MM) for TXD Rigs 201, 202, 203, and 204	TXD-00091 – 94
117.	03/08/07	E-mail from Costello to Joe Poe, R. Yeager, and R. Sitton re: "Purchase Offer; TXD Rigs 201, 202, 203 & 204" and attaching offer letter	TXD-00095
118.	03/08/07	Letter from Costello to Joe Poe, Robert Yeager, Richard Sitton re: follow-up to 3/7/07 meeting and settlement offer	TXD-00097 – 100
119.	03/08/07	E-mail from Costello to Joe Poe, Robert Yeager, and Richard Sitton re: offer letter "assumes and is conditioned on the... rigs and all component parts being new as ordered"	TXD-00095
120.	03/08/07	E-mail from Costello to Joe Poe, Robert Yeager and Richard Sitton requesting previous offer letter to be disregarded and new letter attached with revision re: conditions of rig and parts	TXD-00096
121.	03/08/07	Letter from Costello to Joe Poe, Robert Yeager and Richard Sitton (revised to add 6 th term)	TXD-00101 – 104
122.	03/09/07	E-mail from Joe Poe to Bob Costello, cc: Dick Varnell, Robert Yeager and Richard Sitton with counteroffer	TXD-00105 – 106
123.	03/10/07	Memo from Joe Poe to Bob Yeager re: Chesapeake Number for rigs #201, #202, #203 and #204	
124.	03/10/07	Memo from Joe Poe to Bob Yeager regarding Appraisal Values for Rigs 201-204	
125.	03/13/07	TXD 180 Rig Cost Schedule – Rig #201	

No.	Date	Description	Identifying Info
126.	03/13/07	E-mail from Joe Poe to Bob Costello, cc: Robert Yeager, Dick Varnel and Greg Pearce with TXD rig information attached	TXD-00113
127.	03/13/07	E-mail from Joe Poe to Bob Costello re: will re-send corrected schedule	TXD-00114
128.	03/13/07	Cost Schedule for Rig 201 and component parts	
129.	03/14/07	E-mail from Joe Poe to Bob Costello, cc: Dick Varnel, Robert Yeager, Greg Pearce and Richard Sitton attaching corrected TXD 180 Rig Cost Schedule – Rig #201	TXD-00115
130.	03/15/07	E-mail from Joe Poe to Bob Costello, Robert Yeager, Dick Varnel, Greg Pearce and Richard Sitton re: automatic pipe handling system	TXD-00116
131.	03/16/07	E-mail from Joe Poe to Bob Costello, cc: Dick Varnel and Robert Yeager re: attempt to call and last e-mail not received	TXD-00117
132.	03/16/07	E-mail from Joe Poe to Bob Costello, cc: Dick Varnel, Robert Yeager, Greg Pearce and Richard Sitton re: re-sending e-mail	TXD-00118
133.	03/20/07	E-mail from Bob Costello to Joe Poe with offer of \$20MM and “differences in values” TXD offers to sell CED Rigs 201, 202, 203 and 204 for \$9,250,000 each or total of \$37,000,000	TXD-00122
134.	03/31/07	E-mail from Greg Hillier to Joe Poe regarding Pull test	Ex. 9 to Deposition of Greg Hillier; S000032
135.	04/19/07	Photographs of Rig #201	
136.	5/07 - 7/07	Chesapeake's unpaid invoices from TXD Transport	
137.	7/25/07	E-mail string between Angie Watkins and Shaun Yates of Chesapeake regarding Chesapeake's unpaid invoices to TXD Transport	
138.	10/17/07	Pull Test Report from Dewayne G. Vogt of Woolslayer Companies	
139.	11/14/07	Report of Paul Earl, P.E.	
140.	2006-2007	Chesapeake Drilling Schedule for Arkoma District	
141.	2/07 - 2/08	Unpaid invoices sent to Chesapeake pursuant to Daywork Contract for Rig 201	

No.	Date	Description	Identifying Info
142.		Redline draft of drilling contract sent to Darvin Knapp	
143.		Various color photos of TXD 180 drilling rig and components	
144.		Photographs of Rig #202 and testing equipment taken by Paul M. Earl, P.E. at pull testing of Rig #202	
145.		TXD Services, L.P. Inventory for Rigs 201 through 216	
146.		US Land Rig Specs.	Defendant's Ex. 34 to Deposition of Sam McCaskill
147.		Chesapeake Rig Data	Defendant's Ex. 1 to Deposition of Duane Yost
148.		TXD 180 Load Path Analysis	Ex. 2 to Deposition of Frank Gabriel; S000160-163
149.		Configuration and Pricing for Rotadrill TXD	S000194-200
150.		Schramm TXD Rotadrill Specifications and photos from internet utilized by Paul Earl, P.E. as indicated in his report	
151.		Various photos of TXD 180 from Chesapeake's initial disclosures	
152.		Schramm drawings of trailer rig for TXD sent to Chesapeake	
153.		Financing documents between TXD and CCH	TXD145-233
154.		Financing documents between TXD and D.B. Zwrin	TXD 234-425; TXD 437-479
155.		CCH Term Sheet for TXD Drilling Rigs	TXD 480-490
156.		Documents, including daywork and drilling contracts, evidencing TXD's mitigation of damages re Rig #201	TXD 491-681
157.		TXD Services, LP schematic for Rig #201	
158.		Demonstrative exhibit of traditional drilling rig	
159.		Demonstrative exhibit outlining differences between traditional rig and TXD 180	
160.		Summary of damages demonstrative exhibit to be prepared for use at trial	

No.	Date	Description	Identifying Info
161.		Other demonstrative exhibits and summaries of voluminous exhibits for use at trial	
162.		Deposition transcripts and exhibits as needed, including use for impeachment	
163.		Additional documents requested from Plaintiff or discovered as discovery is ongoing	
164.		Exhibits listed by Plaintiff not objected to by TXD	
165.		Additional documents obtained through subpoenas to third parties	

s/ Lance E. Leffel

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of January, 2008, I electronically transmitted the foregoing to the Clerk of the Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to those parties registered for ECF in this case: Jesse R. Pierce, Michael G. Harris and Fred R. Gipson.

s/ Lance E. Leffel

Lance E. Leffel

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